

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

TERRY DANIEL,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 3:05cv1110-F
)	
CITY OF LANETT, ALABAMA,)	
)	
Defendant.)	

DEFENDANT'S EXHIBIT LIST

COMES NOW the Defendant, City of Lanett, Alabama, by and through its attorney of record, and list the following exhibits, which may be used at the trial of this case:

1. Terry Daniel's personnel file.
2. Affidavit of Chief Anthony Johnson.
3. Affidavit of Mayor Oscar Crawley.
4. Amended Affidavit of Mayor Oscar Crawley.
5. Employee Handbook as of August 1, 2004.
6. Documents relating to Mr. Daniel's EEOC Complaint regarding a Garfield cartoon.
7. Mr. Daniel's job evaluation of January/February 2005.
8. Affidavit of Kelly Meacham.
9. Affidavit of Joel Holley.

10. Memorandum from Chief Anthony Johnson to Mayor Oscar Crawley.
11. Standard Operating Procedure document.
12. Documents regarding Mr. Daniel's grievance in 2000 regarding job change for one day.
13. Documents regarding Mr. Daniel's grievance in 2003 regarding job change for one day.
14. The Plaintiff's Complaint.
15. The EEOC dismissal and notice of rights of September 6, 2005.
16. The EEOC dismissal and notice of rights of March 2007.
17. The Garfield cartoon attached as Exhibit "3" to the Motion for Summary Judgment dated 12/12/04.
18. Affidavit and Release of Terry Daniel dated February 5, 1997.
19. Release and Settlement of Claim of Terry Daniel dated January 24, 2001.
20. Letter to Chief Anthony Johnson from John Butler dated November 29, 2004.
21. Memo from Chief Anthony Johnson to Mayor Oscar Crawley dated December 2, 2004.
22. Documents attached to affidavit of Mayor Oscar Crawley.
23. Any and all exhibits necessary for rebuttal.
24. Any and all exhibits listed by the Plaintiff.
25. Any and all documents produced during discovery.

26. Any and all documents produced during Plaintiff or Defendant's depositions.

Respectfully submitted,

/s/ T. Randall Lyons
T. RANDALL LYONS (LYO006)
Attorney for Above-named Defendant

OF COUNSEL:

Webster, Henry, Lyons & White, P.C.
P.O. Box 239
Montgomery, AL 36101
334-264-9472
334-264-9599

CERTIFICATE OF SERVICE

I hereby certify that I have this date of April 2, 2007, electronically filed the foregoing with the Clerk of the Court using the State of Alabama's electronic filing system which will send notification and a copy of such filing to the following counsel of record:

Heather Newsom Leonard
Heather Leonard, P.C.
2108 Rocky Ridge Road, Suite One
Birmingham, AL 35216

/s/ T. Randall Lyons
OF COUNSEL